

**REMARKS**

Claims 1, 26-29 are amended. Claims 14, 25 are canceled in a prior paper or this paper. Claims 31-40 are new. Thus, claims 1-13, 15-24, and 26-40 are pending.

I. **ISSUES NOT RELATING TO PRIOR ART**

A. **RCE.** A Request for Continued Examination is submitted concurrently herewith. Removal of the finality of the prior Office Action is respectfully requested.

B. **Interview.** Applicant thanks the Examiner for the courtesy of a telephone interview, which was held on May 18, 2006. The interview participants were Mr. Alex Wong who is the applicant and named inventor; Mr. Christopher J. Palermo, the applicant's representative; and Mr. Khanh Dinh, the Examiner. Mr. Wong provided a brief overview of an embodiment of the invention. The parties then discussed the applicant's proposed amendment to independent claim 1 and the cited references.

Mr. Wong stated that the application generally describes allowing users to collect information from various Internet sources and putting it into a user-customized view. Examples include customized homepages or personalized online newspapers. Existing systems for providing such customized content depend on large remote servers that a user must log into with some kind of account. In an embodiment, the present application proposes to move all the processing associated with generating customized content from remote servers to the user's own client system or PC. Instead of accessing an account on a remote server, the user has a personal server running on the PC that gathers information from various Internet sources and presents the customized content to the user locally.

The personal server approach of the application provides privacy because the user's choices about what content he collects is kept on his own computer. He does not have to worry

about this information being stored on a remote server where it could be compromised, abused, rented, shared, or sold. The personal server approach provides much faster access to content. The personal server approach also provides reliability. In the prior art, if access to the remote server is interrupted, then access to all the customized content is lost. But with a personal server, there is no single point of failure. Large remote servers are not required.

Agreement was reached that the proposed amendment distinguished over the references because no reference shows a personal server approach in which content channel information is stored at the personal server, content is retrieved without communication channel selection information across the network, and document synthesizing is performed in the personal server.

C. **Drawings.** In the interview, the Examiner verbally indicated that the originally filed drawings are acceptable.

## II. ISSUES RELATING TO PRIOR ART

### A. **Claim 1—Reisman and Bergman.**

Claims 1-11 and 15-24 and 26-30 stand rejected under 35 U.S.C. 103(a) as allegedly unpatentable over Reisman and Bergman. The rejection is respectfully traversed.

Claim 1 and each of the other independent claims recites a method whose steps are carried out by a personal server that executes at the client. Reisman FIG. 12 shows all servers (136, 132) separated from the client (local station 122) by the telephone network, ISP, and Internet. Reisman FIG. 6 shows the server separated from the client by component 14. Indeed, the Reisman server must use a connection protocol to contact the user—clearly indicating separation. Col. 16 of Reisman describes FIG. 6, stating that the user contacts component 14 through a “call connection,” which must occur through a network such as the PSTN. The

examples (col. 17, 18) all involve communication through a network to the server. No reasonable interpretation can find that the Reisman server is “at” the client.

Claim 1 recites a method that retrieves updated channel content without communicating the channel selection information across the network. Reisman, however, communicates all selection information across the network (col. 15 line 22).

Claim 1 recites a method that synthesizes original, personalized electronic documents from updated channel content from various sources. The Office Action contends that Bergman discloses the claimed synthesis step. While both Applicant’s claims and Bergman use the term “synthesis,” Applicant’s usage refers to a process and method that is distinct from and unrelated to Bergman. In Applicant’s claims, “synthesizing” may refer to combining different channel content from various sources into one or more different electronic documents. In Bergman, however, “synthesis” refers to transformation of formats or “modalities” of a single multimedia content unit into a format suitable for consumption based on the characteristics of the delivery platform and medium (col. 6, lines 15-38 and col. 7 lines 1-25). Bergman does not disclose a method wherein a user may select content from various sources (multiple terminal objects) and have them synthesized together into a single electronic document based on the user’s specification.

Bergman describes a Multimedia Content Description Framework (MCDF), which provides for an InterObject Description Scheme (IODS) that can describe relationships between multiple terminal objects (col. 15 line 5 to col. 20 line 54). However, the MCDF IODS is a *descriptive framework* for describing fixed, pre-existing relationships between terminal objects stored at remote server archives. MCDF does not provide a *constructive method* for an end-user

at the client to specify novel, arbitrary, and personalized relationships between terminal objects, as reflected in Applicant's claims.

In Bergman, the synthesis process occurs at remote archive, proxy content, and adaptation filter servers (FIG. 1, 2). In Applicant's claims, the synthesis occurs at a personal server that executes at the client. Furthermore, the claimed method performs updates and synthesis without communicating channel selection information across the network, thereby keeping the channel selection information private. In contrast, Bergman explicitly communicates all synthesis information across the network, thereby making the synthesis information public (col. 5 lines 15-65).

Claim 29 differs from Reisman for the same reasons given above for claim 1. Reisman (at col. 43 and col. 49) shows methods for managing, relocating, coding, and rewriting links embedded in web content, but does not show a page synthesizer that synthesizes one or more original, personalized electronic documents that contain updated channel content from various sources. Reisman col. 55 shows a method for retrieving updated music information, but does not show a page synthesizer that synthesizes one or more original, personalized electronic documents that contain updated channel content from various sources.

For at least the foregoing reasons, neither Reisman nor Bergman teaches or suggests the independent claims, whether the references are taken alone or in combination. Because of the differences between the independent claims and the base reference, no combination of Reisman and Bergman can provide the complete claimed subject matter. Therefore, a *prima facie* case of obviousness is not established. Reconsideration is respectfully requested.

**B. Claims 12-13—Reisman, Bergman and Linden.**

Claims 12-13 stand rejected under 35 U.S.C. 103(a) as allegedly unpatentable over Reisman, Bergman and Linden. The rejection is respectfully traversed.

Linden shows a system where URL links are encoded with an authentication token at a remote server, and are then sent to users via e-mail. When users activate those URL links, they are returned to the remote server where the encoded authentication token in the URL is validated to allow access to a private resource.

Claim 12 recites a method where a content server embeds multiple content tokens (not authentication tokens) into channel content (not URL links). This channel content is received by the client (not via e-mail), and the tokens are replaced by other channel content or personal content at the client. The client does not use these tokens to return to the remote server as in Linden.

Neither Linden nor Reisman show a personal server executing at the client. Neither Linden nor Reisman show an iteration of a replacement step over channel content by a personal server executing at the client. Reisman teaches away from a combination with Linden. Reisman describes a "transporter [which] automatically effects communication sessions" (Abstract) whereas in Linden, the user must manually access and activate private URLs sent through e-mail. Linden's manual user interaction is precisely what Reisman's invention intends to reduce or eliminate.

The Office Action also relies on Linden FIG. 1, and col. 3, line 31 to col. 4, line 56. Linden's tokens are distinct in function and purpose from the tokens referred to in Claim 12. In Linden, tokens are generated at the server, sent to users via e-mail, and then returned to the server again via a URL. In Claim 12, the tokens are embedded in updated channel content,

which are retrieved by the user, and are never returned to the server. The mere presence of a keyword in a reference does not mean that the reference teaches or suggests the invention.

In Linden, the user does not replace the token. In fact, for Linden's scheme to work, the token must not be replaced, otherwise the validation step will fail. In Claim 12, the tokens embedded in the updated channel content are replaced at the user station with other updated channel content or personal content information located at the client.

In Linden, the token acts a unique identifier. In Claim 12, the token is not unique, but rather is a placeholder to be replaced by updated channel content or personal content information located at the client. A token may be embedded multiple times in the updated channel content, and therefore the tokens are not necessarily unique, as they must be in Linden.

In Linden, the token is associated with a user record stored in a database on the server. In Claim 12, the tokens are not associated with any information stored on the server. To the contrary, the tokens in Claim 12 are associated with and refer to updated channel content or personal content information located at the client.

Bergman includes no discussion of the use of tokens.

For at least the foregoing reasons, none of Reisman, Bergman or Linden teaches or suggests the independent claims, whether the references are taken alone or in combination. Reconsideration is respectfully requested.

**C. New Claims 31-40.**

New dependent apparatus claims 31-35 depend from claim 27 and correspond in scope to method claims 2, 4, 12, 18, and 19. New dependent claims 36-40, in another apparatus formal, depend from claim 28 and also correspond in scope to method claims 2, 4, 12, 18, and 19. By dependency, each of the new dependent claims includes the features discussed above that

distinguish the independent claims from the cited references. Accordingly, new claims 31-40 are allowable for the same reasons given above for the independent claims.

### III. CONCLUSIONS & MISCELLANEOUS

For the reasons set forth above, Applicant respectfully submits that all of the pending claims are now in condition for allowance. The Examiner is respectfully requested to contact the undersigned by telephone if such contact would further the examination of the present application.

A petition for extension of time, to the extent necessary to make this reply timely filed, is hereby made. If applicable, a law firm check for the petition for extension of time fee is enclosed herewith. If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to charge any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,

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